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## HIGHLANDS COALITION

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July 5, 2018

**Betsy Donovan** Remedial Project Manager donovan.betsy@epa.gov

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U.S. Environmental Protection Agency, R2 290 Broadway New York, NY 10007-1866

By email and USPS

**RE: Rolling Knolls Landfill Superfund Site** 

Dear Ms. Donovan and Ms. Kaur:

Please accept these comments in support of those submitted by the Great Swamp Watershed Association, a member of the NJ Highlands Coalition, a coalition of more than 100 groups that support protecting and enhancing the resources of the New Jersey Highlands. Harding Township is a NJ Highlands muncipality immediately adjacent to the Rolling Knolls Landfill Superfund Site. Further, through both professional and personal experience, I know that the Great Swamp Watershed Association (GSWA) has had a long and collaborative relationship with the Great Swamp National Wildlife Refuge (Refuge). The Coalition supports the recommendations proposed by the Refuge and strongly encourages the EPA to revise the feasibility study of potential clean up options for Rolling Knolls to include these alternatives.

This site has been a challenging one for decades and there is no need to rush to a Record Of Decision at this juncture without adequately and thoughtfully evaluating all possible remedies. The remedy proposed by the Refuge deserves to be included by EPA as a viable option. This option offers the potential for reduced cost and acceptable implementation, as well as improved ultimate remediation for the benefit of wildlife and the public.

The Coalition supports removal of all contamination from the 30 acre Refuge portion of the site followed by restoration of habitat for wildlife and passive recreation. The cleanup remedy for the Refuge portion of the site should provide complete restoration of the landfill to an area protective of human health and wildlife. The Refuge proposal to consolidate landfill material into a centralized location or locations on the larger site, and capping with on-site materials, is sensible. Fully remediating the contamination and restoring a productive biological community on the site will improve the value of the neighborhood and benefit the community. The Coalition supports the recommendations of the Refuge to clean all landfill contaminants from the Refuge owned portion of the site

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and contain them on the remaining portion. This alternative manages costs and community disturbances while ensuring the Refuge land is protected for wildlife and habitat and for all Americans in perpetuity.

Sincerely,

Julia Somers

**Executive Director**